

**IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT  
OF NORTH CAROLINA**

VOTO LATINO, THE WATAUGA COUNTY VOTING RIGHTS TASK FORCE, DOWN HOME NORTH CAROLINA, SOPHIE JAE MEAD, and CHRISTINA BARROW,

## Plaintiffs,

V.

ALAN HIRSCH, in his official capacity as Chair of the State Board of Elections, JEFF CARMON, in his official capacity as Secretary of the State Board of Elections, STACY EGGERS IV, in his official capacity as Member of the State Board of Elections, KEVIN N. LEWIS, in his official capacity as Member of the State Board of Elections, SIOBHAN O'DUFFY MILLEN, in her official capacity as Member of the State Board of Elections, KAREN BRINSON BELL, in her official capacity as Executive Director of the State Board of Elections, DAWN Y. BAXTON, in her official capacity as Chair of the Durham County Board of Elections, DAVID K. BOONE, in his official capacity as Secretary of the Durham County Board of Elections, DR. JAMES P. WEAVER, in his official capacity as Member of the Durham County Board of Elections, PAMELA A. OXENDINE, in her official capacity as Member of the Durham County Board of Elections, DONALD H. BESKIND, in his official capacity as Member of the Durham County Board of Elections, MICHAEL BEHRENT, in his official capacity as Chair of the Watauga County Board of Elections, ERIC ELLER, in his official capacity as Member of the

Case No. 1:23-CV-861-TDS-JEP

Watauga County Board of Elections, §  
MATT WALPOLE, in his official §  
capacity as Member of the Watauga §  
County Board of Elections, LETA §  
COUNCILL, in her official capacity as §  
Member of the Watauga County Board of §  
Elections, ELAINE ROTHENBERG, in §  
her official capacity as Member of the §  
Watauga County Board of Elections, §

Defendants.

**MOTION TO INTERVENE AS DEFENDANTS BY THE REPUBLICAN  
NATIONAL COMMITTEE, NORTH CAROLINA REPUBLICAN PARTY;  
BRENDA M. ELDRIDGE; AND VIRGINIA ANN WASSERBERG**

Pursuant to Federal Rule of Civil Procedure 24, the Motion to Intervene should be granted for all the reasons stated in the Memorandum in Support of the Motion to Intervene being filed contemporaneously with this Motion.

The Movants – who seek to intervene as Defendants in this action – are as follows:

1. Republican National Committee: The Republican National Committee is a national committee, as defined by 52 U.S.C. §30101, that manages the Republican Party's business at the national level, supports Republican candidates for public office at all levels, coordinates fundraising and election strategy, and develops and promotes the national Republican platform.
2. North Carolina Republican Party: The North Carolina Republican Party is a state political party that works to promote Republican values and to assist Republican candidates in running for partisan federal, state, and local offices in North Carolina,

representing the interests of more than 2 million registered Republican voters in the state.

3. Brenda M. Eldridge: Ms. Eldridge is a registered North Carolina voter and is registered as a Republican. She is a past chair of the Cumberland County Republican Party. She has previously served as a poll observer in North Carolina elections and intends to do so again in the future.
4. Virginia Ann Wasserberg: Ms. Wasserberg is a registered North Carolina voter and is registered as a Republican. She currently serves as chair of the Pasquotank County Republican Party, and in that role, appoints site-specific and county at-large election observers. She has previously served as a poll observer in North Carolina elections and intends to do so again in the future.

To satisfy the pleading requirement of Fed. R. Civ. P. 24(c), attached to this motion as Exhibit 1 is a Proposed Answer to Plaintiffs' Complaint. In filing this Proposed Answer, Movants do not waive the right to move this Court for dismissal of any of Plaintiffs' claims that fail on procedural and/or legal grounds, should intervention be granted.

Respectfully submitted, this the 26<sup>th</sup> day of October 2023.

**Chalmers, Adams, Backer & Kaufman, PLLC**

By:/s/ Philip Thomas

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**ATTORNEYS FOR MOVANTS**

**CERTIFICATE OF SERVICE**

I hereby certify that I filed the forgoing document using the Court's CM/ECF System which will send notification to all counsel of record.

This 26<sup>th</sup> day of October, 2023.

**Chalmers, Adams, Backer & Kaufman, PLLC**

*/s/ Philip Thomas*

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N.C. Bar No. 53751